

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

Lee M. Berger and Alice A. Berger,  
Individually and on Behalf of All  
Other Persons Similarly Situated

*Plaintiffs,*

vs.

Bank of America, N.A.; and  
BAC Home Loans Servicing, LP,

*Defendants.*

CIVIL ACTION NO. 10-11583

CLASS ACTION

STANLEY KOLBE, individually and on  
behalf of all other persons similarly situated,

Plaintiff,

v.

BAC HOME LOANS SERVICING, L.P., and  
BALBOA INSURANCE COMPANY,

Defendants.

Civil Action No. 1:11-cv-10312

SUSAN LASS, as an individual and as a  
representative of the classes,

Plaintiff,

v.

BANK OF AMERICA, N.A. and BAC HOME  
LOANS SERVICING, L.P.,

Defendants.

Civil Action No. 11-10570-NMG

**JOINT STIPULATION TO EXTEND TIME AND PROPOSED ORDER**

On May 27, 2011, Plaintiff Susan Lass filed in this Court a First Amended Class Action Complaint. Plaintiff and Defendants (the "Parties"), having conferred, hereby stipulate that Defendants shall have until June 27, 2011 to move to dismiss Plaintiffs' First Amended Class Action Complaint, and Plaintiff shall have until July 18, 2011 to respond to Defendants' motion..

The Parties respectfully request that this Court enter this Stipulation as an Order.

Plaintiff Susan Lass

Bank of America, N.A.; and BAC Home Loans  
Servicing, LP

By her attorneys

By their attorneys

/s/ Kai Richter

NICHOLS KASTER, PLLP

Paul J. Lukas, MN Bar No. 22084X\*

E. Michelle Drake, MN Bar No. 0387366\*

Kai Richter, MN Bar No. 0296545\*

Rebekah L. Bailey, MN Bar No. 0389599\*

*\*Admitted Pro Hac Vice*

4600 IDS Center

80 South Eighth Street

Minneapolis, MN 55402

Telephone: (612) 256-3200

Fax: (612) 215-6870

/s/ Matthew G. Lindenbaum

John C. Englander (BBO# 542532)

Matthew G. Lindenbaum (BBO# 670007)

Mark T. Knights (BBO# 670991)

GOODWIN PROCTER LLP

53 State Street

Boston, Massachusetts 02109

Tel.: 617.570.1000

Fax: 617.523.1231

jenglander@goodwinprocter.com

mlindenbaum@goodwinprocter.com

mnknights@goodwinprocter.com

*and*

KEANE, KLEIN & DUFFEY

Thomas W. Duffey, MA Bar No. 563616

1 Church Court

Boston, MA 02129

Telephone: (617) 242-8383

Fax: (617) 242-8313

SO ORDERED

Date: June \_\_\_, 2011

\_\_\_\_\_  
Hon. Nathaniel M. Gorton, U.S.D.J.

**CERTIFICATE OF SERVICE**

I, Matthew G. Lindenbaum, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on June 7, 2011.

Dated: June 7, 2011

/s/ Matthew G. Lindenbaum

Matthew G. Lindenbaum